

III. Remarks/Arguments

Claims 1-20 were originally filed in the present application. Claims 2, 12 and 16 were subsequently canceled without prejudice or disclaimer. No claims are currently canceled or added. Thus, claims 1, 3-11, 13-15 and 17-20 are currently pending in the present application. Reconsideration of this application in light of the following remarks is respectfully requested.

Rejections under 35 U.S.C. §102

Claims 1, 3 and 5-11, 13-15, and 17-20 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,803,302 to Pozder, et al. ("Pozder"). Applicants respectfully traverse these rejections for the following reasons.

Claim 1

The PTO provides in MPEP §2131 that: "to anticipate a claim, the reference must teach every element of the claim." Therefore, to support a rejection of claim 1, Pozder must contain all of the elements of claim 1.

Pozder discloses, and depicts in Fig. 2:

- a conductive bond pad 134 formed in an interlevel dielectric layer 130,
- a dielectric passivation layer 136 having portions removed to form dielectric support structures 138, and
- a conductive capping layer 204 formed over the dielectric passivation layer 136, including portions extending between the dielectric support structures 138 to contact the conductive bond pad 134.

Pozder also discloses, and depicts in Fig. 3:

- dielectric studs 302 positioned beneath the dielectric support structures 138 within the conductive bond pad 134.

However, Pozder does not disclose that the conductive capping layer 204 can comprise a plurality of discrete conductors separated by portions of the dielectric passivation layer 136 (the dielectric support structures 138). That is, Pozder only discloses that the conductive capping layer 204 is a single discrete conductive member, merely having portions extending between the dielectric support structures 138.

Pozder fails to disclose that the portions of the conductive capping layer 204 which extend between the dielectric support structures 138 comprise a plurality of discrete conductors.

Consequently, Pozder necessarily fails to disclose “an electrode located over the insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer,” as recited in claim 1 of the present application.

Moreover, Pozder fails to disclose that each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 has a surface configured to be bonded to external circuitry. In contrast, each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 are configured to be indirectly connected to external circuitry by the bulk portion of the conductive capping layer 204 overlying the dielectric passivation layer 136.

Therefore, Pozder also necessarily fails to disclose that each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 “has a first surface configured to be bonded to external circuitry” in the context of claim 1 of the present application.

For at least these reasons, the §102(e) rejection of claim 1 is not supported by Pozder. Accordingly, Applicants respectfully request the Examiner withdraw the §102(e) rejection of claim 1 and its dependent claims.

Claim 11

As described above, to support a rejection of claim 11, Pozder must contain all of the elements of claim 11. However, as also described above, Pozder fails to disclose an electrode located over an insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer, in the context of claim 11 of the present application. Moreover, Pozder also fails to disclose an electrode having a plurality of discrete conductors that each have a surface configured to be bonded to external circuitry, in the context of claim 11 of the present application. For at least these reasons, the §102(e) rejection of claim 11 is not supported by Pozder. Accordingly, Applicants respectfully request the Examiner withdraw the §102(e) rejection of claim 11 and its dependent claims.

Claim 15

As described above, to support a rejection of claim 15, Pozder must contain all of the elements of claim 15. However, as also described above, Pozder fails to disclose an electrode located over an insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer, in the context of claim 15 of the present application. Moreover, Pozder also fails to disclose an electrode having a plurality of discrete conductors that each have a surface configured to be bonded to external

Appl. No. 10/680,664
Reply to Final Office Action of 12/15/2005

Atty Docket No. 24061.43
Customer No. 000042717

circuitry, in the context of claim 15 of the present application. For at least these reasons, the §102(e) rejection of claim 15 is not supported by Pozder. Accordingly, Applicants respectfully request the Examiner withdraw the §102(e) rejection of claim 15 and its dependent claims.

IV. Conclusion

It is clear from all of the foregoing that independent claims 1, 11 and 15 are in condition for allowance. Dependent claims 3-10, 13, 14 and 17-20 depend from and further limit independent claims 1, 11 and 15 and, therefore, are allowable as well.

It is believed that all matters set forth in the Office Action have been addressed. Favorable consideration and an early indication of the allowability of claims 1, 3-11, 13-15 and 17-20 are respectfully requested. Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,



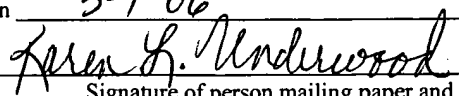
Dave R. Hofman
Registration No. 55,272

Dated: 5/1/06

HAYNES AND BOONE, LLP
901 Main Street, Suite 3100
Dallas, Texas 75202-3789
Telephone: 972/739-8630
IP Facsimile No. 214/200-0853
Docket No. 2002-0978 / 24061.43

R-126033.1

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

on 5-1-06

Signature of person mailing paper and fee